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# UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

JOSH COHEN  
Plaintiff

Action Squared  
Defendants

Civil Action:  
Copyright Infringement  
Injunctive and Damages  
Sherman Act

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1. After serving as Director of Technology for the 2012 Washington State Gay Marriage campaign, Plaintiff founded and lead a project, Open Supporter Data Interface (OSDI), which functioned as a Standards Development Organization (SDO) consistent with CIRC in the market for Digital Political Microtargeting Platforms. Over 300 committee meetings occurred, with Plaintiff contributing the majority of the essential IP (copyright registrations Txu 2-249-951, TX0009315996) and labor to run the project and traveling to industry conferences including Netroots Nation to drive adoption of the standard. By summer 2017, with a 2x ROI for Application integrations, OSDI had become the largest REST based API ecosystem in the market for digital microtargeting platforms. With platform #3 and 3x ROI imminent, the external network effect was at the tipping point of becoming permanent until the next technology generation. It was a valuable economy of scale, which Plaintiff sought to protect from the VC mindset.
2. Plaintiff's contributions were based on terms of democracy as a governance model, "one company one vote" level playing field to build an external network effect so market players can compete at the level of the market. Plaintiff funded over 3000 hours of his labor on OSDI through mid-2019, and more on a sole-proprietorship building tools based on the standard, by selling shares of stock from his retirement savings. Plaintiff seeks the court's help in recovering his retirement savings and restoring the external network effect.
3. Over time, Defendants joined the project, agreeing to these terms under false pretenses to fraudulently induce labor while engaging in a pattern of racketeering activity using wire fraud and extortion to gain control of the project and its assets succeeding 2018, then operated the project continuing the extortion and using wire fraud attempting to coerce or trick Plaintiff into abandoning his property rights. The coercion ended when Defendants broke contact in early 2020.
4. While this was occurring, Defendants chronologically staggered the onset of the essential elements of their violations, used parallel conduct and proxies, varied communication mediums, fraudulent concealment, active misleading to conceal the property interest, power disparity used to gain control, founding of venture capitalists, and their actions to invest the proceeds into their own enterprises. Defendants ensured no one came to Plaintiff's aid, sabotaged his ability to connect the dots and recognize he was in a "no way out" extortion plot and warehoused their infringement to prevent Plaintiff from discovering the facts and claims necessary to bring a complaint forward sooner. Plaintiff worries that the situation is more dangerous than he realizes, and seeks the court's help in restraining Defendants Abuse of Process and Litigation Privilege.
5. One of these enterprises if Action Squared, a joint development effort between Action Network and AFL-CIO, which develops products Action Network and Action Builder, which both infringe on Plaintiff's copyrights.

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## I OSDI FOUNDING

6. The OSDI project began with a kick-off panel at RootsCamp 2012.
  
7. 📺 Web Page "Rootscamp 2012 Wall" [D1476]
  
8. 📺 "Room 141 : Making Salse, NGPVAN, Amicus, Nation Builder Get Along W/O CSV Suffering" [D1476]

### **I.A Initial Specification**

9. Plaintiff authored the original OSDI specification, began evolving it.
  
10. ⏰ 2013-04-03 10:13am 📲 Email "Draft for 4/3 call" [D685\*] 🚂 Josh Cohen; 🚂 Josh Cohen, Self; 🚂 Osci Dev
  
11. 📲 🚂 Josh Cohen 🗣 "Hi Folks,I've drafted some model work based on our last meeting's conversations. It is attached for discussion on this week's call. (4/3 4pm est)The key challenge from our last discussion was how to keep relative simplicity for doing very common things like "Showme the most recent donations", "Show event signups" but also allow interaction style modeling." ⏰ 10:13a [D685]
  
12. 📄 Specification "OSDI v0.0.5" [D686]

Open Supporter Data Interface

Author: Josh Cohen

Version: 0.05pre

Overview

This specification defines a common HTTP based REST protocol and data model for accessing supporter data. The data model includes persons, events, donations, general advocacy actions and is extensible for future needs.

📄 🚂 Josh Cohen [D686]

13.  "7.2 API Entry Point – Prior to accessing specific provider data, a client should access the API Entry Point (AEP) on the provider and retrieve a representation of the providers configuration metadata. This metadata shall contain a list of resource types that the provider supports along with the URIs for accessing them."  J. Cohen [D686]
14.  "7.7.1 Match (aka Person Signup Helper later) -- The Match and method allows a client to read or perform an update to a Person resource without knowing the precise resource it wishes to update. This avoids a multistep process where the client would first have to query to find a matching resource and then do a subsequent request to update its data."  J. Cohen [D686]

## I.B Democracy as a Governance model

15. On August 1, 2013, the committee approved its first governance document, which specified a democratic process, an organizational structure with technical and governance committees, and a policy known as a "Progressive Keel" to prevent "Progressive" or "Democratic" intellectual property from leaking to conservative/republicans while still protecting customer choice.
16. The approval was communicated to the membership via email on 8/1/2013:
17.  2013-08-01 5:03pm  Email "Announcing Approval of Governance Democracy" [D289]  Josh Cohen; 
18.   Josh Cohen  "In today's meeting, the governance proposal was adopted. This means significant changes in our structure. Two new committees are now forming, Governance, and Progressive Political."  5:03a [D289]
19. The document itself specified:

20.  Specification "OSDI Governance Enacted 8/1/2018" [D483]
-  Key points of these changes
- We're identifying our target customers as progressive.
  - We're identifying our membership as both progressive and non-partisan
  - We're providing a space that keeps the progressive IPR and related discussions restricted to progressives.
  - We're making a long term investment in the progressive tech ecosystem.
-   Josh Cohen [D483]
- Role vs ideology vs participation  
This table is meant to establish a set of principles and criteria for evaluating membership.
-   J. Cohen [D483]
- <strong>General Operating Rules</strong>  
Robert's Rules  
We operate according to RONR  
Motions do not require a second  
Process disputes get resolved by Governance
-   J. Cohen [D483]
- <strong>Electronic voting</strong>  
A member can request a motion to the chair  
Chair will send the question to the committee  
72 hour voting period  
After 72 hours chair will declare the results
-   J. Cohen [D483]
- <strong>Invitations / onboarding new members</strong>  
Once a decision has been made to invite an entity:  
Appropriate votes are held in the governance committee to approve invitation  
An invitation goes out to the entity  
The entity accepts the invitation and agrees to responsibilities

They are added to appropriate groups and places on the website  
They start attending the appropriate committee meetings.

J. Cohen [D483]

21. The nuanced "Progressive Keel" policy was defined with a 7x6 matrix:

#### Role vs ideology vs participation

This table is meant to establish a set of principles and criteria for evaluating membership.

Customer Spectrum -> Role \/	Dem/Progressive Political campaigns	Progressive non-profit	Social Good Non Profit	Mainstream Industry Vendor	Bi-partisan political /non-profit	Conservative / Republican
Public Reviewer	R	R	R	R	R	R
Invited Expert	I,P	I,P	I	I	I	R
Customer / Consultant	I,P,G	I,P,G	I,G	I	I	R
Application Vendor	I,P,G	I,P,G	I,P,G	I,G	I	R
CRM Platform Vendor	I,P,G	I,P,G	I,G	I	I	R
Shared Data Warehouse Vendor	I,P,G	I,P,G	I	I	I	R
Dataset Provider	I,P,G	I,P,G	I	I	I	R

#### Taxonomy

## II ACTION NETWORK JOINS

22. Action Network joined the project in November 2013, implemented the specification using source code provided by plaintiff (copyright registration Txu 2-386-143),

### II.A Beth Becker introduces Action Network to OSDI

23. 2013-09-17 4:27pm Email "Beth introduces Action Network" [D509] Beth Becker; Beth Becker, Becker Digital; Jason Rosenbaum, Action Network, Action Network; Brian Young, Action Network, Action Network; Brian Young, Action Network; Josh Cohen, Self

Josh...meet my friend Jason Rosenbaum of Action Network

Jason...meet my friend Josh Cohen. You've probably heard rumbling about the common API project and Josh is involved with that. Thought you two would have much to chat about:)

Beth Becker 4:27p [D509]

24. Jason Rosenbaum, Action Network "Thanks Beth! Nice to meet you, Josh. I was talking with Tim Anderegg a bit last week about the project, it's definitely something we're very interested in as we make plans for our API." 5:02p [D509]

25. Brian Young, Action Network "Hey Josh, Jason's off getting married this weekend, so he's out of

touch for a bit ... happy to chat in some broad strokes about this, but Jason's our Director of Tech and really the guy to deal with the timeline and implementation on it. I share his interest in your project, though! We're moving to building out some APIs, as Jason mentioned." ⏱ 2013-09-26 9:46am [D509]

26. Action Network is provided with the Governance policy, which it agreed to in order to join.

27. ⏱ 2013-11-04 1:09pm 📲 Email "Invitation Extended to Action Network" [D208] 🚂 Tim Anderegg; 🚂 Tim Anderegg, Noi, NOI; 🚂 Jason Rosenbaum, Action Network, Action Network; 🚂 Josh Cohen, Osdi, Self

28. 📲 🚂 Josh Cohen, OSDI ⏱ "Invitation Extended to Action Network" ⏱ 1:09p [D208]

29. 📲 🚂 Tim Anderegg, NOI ⏱ "We've officially made the motion to induct CAN into OSDI (no one has raised any objections yet, and I don't anticipate any), and Josh Cohen would like to have a call with you to give you an overview of the structure, process, and what not. Would you have time to have a chat with us tomorrow at 4pm, or sometime on Wednesday?" ⏱ 10:09a [D208]

Tomorrow is busy but Wednesday is largely free outside of 5:30pm. So pick a time on Wednesday?

Exciting news!

Tim Anderegg:

Wednesday seems to work best for folks, should we shoot for Wednesday afternoon, say 1pm? Let me know what works best.

Jason Rosenbaum:

Good here!

✉ 🚂 Jason Rosenbaum, Action Network ⏱ 10:26a [D208]

Tomorrow is busy but Wednesday is largely free outside of 5:30pm. So pick a time on Wednesday?

Exciting news!

Tim Anderegg:

Wednesday seems to work best for folks, should we shoot for Wednesday afternoon, say 1pm? Let me know what works best.

Jason Rosenbaum:

Good here!

✉ 🚂 J. Rosenbaum ⏱ 10:26a [D208]

Jason, I've attached a few docs for you to skim that we'll touch on in the call.

1: Governance: the description of the informal org structure, roles/taxonomy of membership,

2: the one pager

2 attachments

osdi-governance..v3-final.docx 21K

one-sheet.pdf 306K

✉ 🚂 J. Cohen ⏱ 1:57p [D208]

30. On 11/06/13, during a telephone meeting, Action Network agreed to the policy and was accepted into the committee.

31. 📄 Document "OSDI Action Network Membership Meeting" [D952]

32. 📄 "Meeting with Josh Cohen and Tim Anderegg from OSDI and Action Network's Jason Rosenbaum to review procedures and membership." 🚂 Josh Cohen [D952]

33. 📄 "Accepted and attended" 🚂 J. Cohen [D952]

34. 📄 Document "add jason rosenbaum the action network to authors opensupporter osdi docs 17abb23" [D965]

add jason rosenbaum, the action network to authors  
commit 17abb23cdb287b1a5c2

📄 [D965]

### **III 1ST PLATFORM IMPLEMENTATION: ACTION NETWORK**

35. ⏱ 2014-01-28 4:04pm 📧 Email "Getting ready to start!" [D1621] 🚂 Jason Rosenbaum; 🚂 Jason Rosenbaum, Action Network; 🚂 Josh Cohen, Self; 🚂 Gustavo Costa

Were going to start work this week on our implementation of OSDI!  
Ive copied Gustavo on this email, our lead backend developer. Can you add him to the relevant things (github, lists, call reminders) so he can participate as he sees fit?  
Thanks!

Jason

✉️ 🚂 Jason Rosenbaum ⏱ 4:04p [D1621]

Good news.

Hi Gustavo.

- 1) What is your github username?
- 2) To join the google group, go here: <https://groups.google.com/forum/#!forum/osdi-dev>
- 3) Dev calls are 12p eastern on Thursdays
  - a. <https://join.me/joshrcohen>
  - b. Dial-in: +1.
  - c. passcode: 191-283-515#

Josh Cohen | [\[joshco?\]](#) <<http://twitter.com/joshco>> | [linkedin.com/in/joshrcohen](http://linkedin.com/in/joshrcohen) <<http://linkedin.com/in/joshrcohen>> | [github.com/joshco](http://github.com/joshco) <<http://github.com/joshco>>

✉️ 🚂 Josh Cohen ⏱ 2014-01-30 2:04am [D1621]

36. 📧 🚂 J. Rosenbaum ⏱ "Pretty sure you mean 3pm Easter/12pm Pacific for calls, unless weve changed our regular time :)" ⏱ 7:34a [D1621]

Hey Josh,

My github username is gcosta. Just applied to the google group. Pretty excited to be a part of this!

✉️ 🚂 Gustavo Costa ⏱ 9:37a [D1621]

37. ⏱ 2014-02-03 10:44am 📧 Email "Few things as we're getting started here..." [D510] 🚂 Jason Rosenbaum; 🚂 Jason Rosenbaum, Action Network; 🚂 Josh Cohen, Self

First, can you accept Gustavo into the google groups? I believe he applied.

Second, Im thinking about how I want to test what were building (the way we work is Gustavo implements, lets me know its ready for testing, and I do the QA and bug tickets and we work through them together). Im going to need some kind of API browser/console to test responses and functionality. And Im going to need to figure out how to verify were within the spec.

Is this something youd be willing to help on? I dont think youd need to be involved day to day (Id certainly do the first swipe at testing and the big bug tickets) but it would be helpful for us to perhaps set up a shared API browser that you and I can use, and I can call you in to test certain bits of functionality we think weve completed and verify were hitting the standard.

What do you think? And even just help on figuring out how to set up that test environment would be great on my end. Im guessing I want something like the JSON+HAL browser that OSDI currently uses for the demo, right?

Jason

✉️ 🚂 Jason Rosenbaum ⏱ 10:44a [D510]

He's been added.

Yes, I would like to be involved. Your description below sounds good. I'd also be interested in hearing your implementation/architecture choices to implement. Let me know what you need.

Browser

RE browser, I use "hal-browser" on the prototype. [Api.opensupporter.org](http://api.opensupporter.org)

This is some HTML/JS/CSS that you drop in to the webroot (public folder on a rails app.)

You can look at it in the github repo

<https://github.com/wufm/osdi-prototype>

<https://github.com/wufm/osdi-prototype/tree/master/public/hal-browser>

I believe there is a later version of the code

<https://github.com/mikekelly/hal-browser>

Tests

It would be cool if we had some common test case/tools

Implementation

The prototype uses roar-rails which is based on representers.

[https://github.com/wufm/osdi-prototype/blob/master/app/representers/person\\_representer.rb](https://github.com/wufm/osdi-prototype/blob/master/app/representers/person_representer.rb)

[https://github.com/wufm/osdi-prototype/blob/master/app/controllers/api/v1/people\\_controller.rb](https://github.com/wufm/osdi-prototype/blob/master/app/controllers/api/v1/people_controller.rb)

Josh Cohen | **[joshco?]** <<http://twitter.com/joshco>> | [linkedin.com/in/joshrcohen](http://linkedin.com/in/joshrcohen)

<<http://linkedin.com/in/joshrcohen>> | [github.com/joshco](http://github.com/joshco) <<http://github.com/joshco>>

Josh Cohen 2014-02-04 5:00pm [D510]

Awesome, this is all great!

I think as we start putting up pieces, well add you to our issue tracking system on specific tickets so you can test along with us. Well probably add you to tickets once we've had our first pass at bug fixes, so you're not looking at things that are completely broken.

I'll be setting up the HAL browser on a different url, just to make sure we're testing in real-world-like scenarios (cross domain, over the open internet, etc)

We should be done with the first version of the endpoint and person model for testing soon!

J. Rosenbaum 2014-02-05 1:53pm [D510]

38. J. Rosenbaum "Were actually ready for you sooner than we thought have some questions about authentication as we start up here. Adding you to a ticket shortly." 2:21p [D510]

Ok, you should have a lighthouse invite to our ticket tracking waiting for you. Let me know when you accept it.

Also, can we be added to the osdi-prototype repo? We're using the same libraries, so it will allow us to copy/paste a bit and save some time...

J. Rosenbaum 2:29p [D510]

39. J. Rosenbaum "Cool, and let me know when you've had a chance to get on our ticket tracking, so I can add you to some tickets and ask a few questions." 7:25p [D510]

40. 2014-04-08 11:27am Email "[osdi] Our OSDI API has launched!" [D403] Jason Rosenbaum; Jason Rosenbaum, Action Network, Action Network; Seth Bannon, Amicus, Amicus; Harlan Hill, Indigo Strategies; Topper Bowers, Amicus; Josh Cohen, Self

**[osdi] Our OSDI API has launched!**

17 messages

Jason Rosenbaum [REDACTED] Tue, Apr 8, 2014 at 11:27 AM

Reply To: [REDACTED]

To: [REDACTED]

Hey folks, wanted to let everyone know that we officially launched our OSDI API last week! Check out the documentation and browser here:

<https://actionnetwork.org/docs>

And let me know if you want an API key!

-- Jason

Jason Rosenbaum  
Director of Technology  
The Action Network

#### "Action Network Initial OSDI Implementation Notification"

Hey folks, wanted to let everyone know that we officially launched our OSDI API last week! Check out the documentation and browser here:

LINK

And let me know if you want an API key!

Jason Rosenbaum, Action Network 11:27a [D403]

This is great. Nice work!  
Cheers

Seth Bannon, Amicus ④ 11:32a [D403]

41. Harlan Hill, Indigo Strategies ④ "Awesome!" ④ 11:35a [D403]

42. Topper Bowers, Amicus ④ "this is great! Good work!" ④ 11:42a [D403]

Works, but two nits.

- 1) The link in your docs goes to the hal browser but it doesn't have an endpoint filled in, so it just gives some html rather than the AEP.
- 2) API key header is not standard (and doesn't accept the standard OSDI-API-Key)

Josh Cohen ④ 2014-04-11 5:08pm [D403]

Good call on the browser link, I'll change it.

For the key -- since we launched the spec has changed and moved forward. The standard key name was approved after we launched.

The way I see it is, the spec is changing fast, but we're moving towards a stable v1 or v0.9 or whatever we call it for the summer. Once we get there and that's locked down, we'll update all the stuff that's changed. Until then, I don't want to have to keep on top of week to week changes.

J. Rosenbaum ④ 5:10p [D403]

OK. Can we make it a goal to have the spec locked from a break-compat pov well in advance of netroots nation (so you can be ready for interop demos)?

Also, can I see your POST/write versions of the controllers?

J. Cohen ④ 6:15p [D403]

Yeah, totally -- that definitely should be the goal. And perhaps we're close -- once we get some of these editing github issues out of the way and get tags done, we might want to lock right there and start on a new version.

J. Rosenbaum ④ 6:21p [D403]

here's our representers and controllers, as discussed -- as before, for personal use or for inspiration for your OSDI work only.

J. Rosenbaum ④ 2014-04-14 2:04pm [D403]

43. Specification 'The Action Network' [D389]

The screenshot shows a web browser window with the title "The Action Network" and the URL "https://web.archive.org/web/20140831232044/https://actionnetwork.org/docs". The page content is titled "The Action Network API -- Getting Started". It contains text about the API's purpose, a note that it's not intended to replace the user interface, and a section on "Technical considerations". On the right side, there are links for "Action Network API Documentation", "Getting Started", "Tutorials", and "Documentation", each with a list of sub-links. The browser interface includes a search bar, a date range selector (JUL 31 MAR 2014 2015), and social media sharing buttons.

**The Action Network API -- Getting Started**

The Action Network API allows organizers with Action Network accounts and API keys to interact with the Action Network system. The API supports use cases such as syncing online organizing data (people, email addresses, action histories) with other systems, migrating data between systems, managing subscriptions, pulling embed code for actions into CMS systems, and similar functions.

The API is *not* intended to enable the creation of a replacement user interface.

**Sections:**

- Technical considerations
- Getting started
- Browsing the API
- Tutorials: Making your first calls

**Technical considerations**

The Action Network API is served in HAL+JSON format. It generally conforms to the Open Supporter Data Interface (OSDI) specification, which can be found at [opensupporter.org](http://opensupporter.org).

HAL provides links to make navigation between endpoints and resources easy. In addition, the API is curried, linking directly to documentation within API calls.

**Action Network API Documentation**

**Getting Started:**

- Get people
- Get actions
- Get action takers
- Get embed code
- Add people
- Add actions and action takers
- Unsubscribe people

**Tutorials:**

- General Principles
- Attendance
- Campaigns
- Donations
- Embeds
- Event Campaigns
- Events
- Forms
- Fundraising Pages
- Items
- People
- Petitions
- Queries
- Question Answers
- Questions

**Documentation:**

- General Principles
- Attendance
- Campaigns
- Donations
- Embeds
- Event Campaigns
- Events
- Forms
- Fundraising Pages
- Items
- People
- Petitions
- Queries
- Question Answers
- Questions

### Getting Started - The Action Network API [D389]

44. "The Action Network API is served in HAL+JSON format. It generally conforms to the Open Supporter Data Interface (OSDI) specification, which can be found at [opensupporter.org](http://opensupporter.org)." [D389]

## IV 2ND PLATFORM IMPLEMENTATION: NGPVAN

45. Implementation Commitment
46. Self-Preferencing Architecture
47. In September 2015, NGPVAN's OSDI implementation came online, offering a 2x ROI. It is demoed at Netroots Nation 2015.
48. ⏱ 2015-09-09 10:43am 📧 Email "[osdi-gov] VAN's OSDI Implementation launched this week!" [D312] @ List dev, 🚩 Shai Sachs; 🚩 Shai Sachs, NGP VAN; 🚩 Seth Bannon, Amicus; 🚩 Jason Rosenbaum, Action Network; 🚩 Joe Mc Laughlin; 🚩 Josh Cohen, Self; 🚩 Osdi Governance, Osdi Cmte; 🚩 Osdi Dev; 🚩 Josh-co, Microsoft
49. [View on osdi-dev](#)
50. 📧 🗣 "VAN informs OSDI that it's OSDI service is released to the public" ⏱ 10:43a [D312]

Hi friends,

I'm pleased to report that we launched our OSDI implementation this week! The text from our VAN "What's New" post appears below, and I think there'll be a little more hoopla later this month or next. In the meantime, enjoy all that HALLY goodness!

Shai

Earlier this year, the Open Supporter Data Interface (OSDI) coalition (<http://opensupporter.org/>) released version 1.0 of its specification. As a leading member of this coalition, NGP VAN committed to implementing the specification by the end of the summer. This morning, we've released our implementation of the OSDI specification.

The OSDI implementation allows VAN API Developers to access people records (including My Voters and My Campaign records), Activist Codes, and Survey Questions, via the OSDI specification. Developers may also create new My Campaign records, and post canvass responses to My Voters and My Campaign records.

Documentation for the OSDI implementation has been released on our Developer's Portal (<http://developers.ngpvan.com/osdi>). The endpoint for the new OSDI service is <https://osdi.ngpvan.com/>. Developers who have VAN API keys may begin using the service immediately, and those who wish to use the service but do not yet have a key should request a VAN API key at <http://developers.ngpvan.com/apiKey/request>.

The code for the OSDI service is open source and has been released under the Apache license; it is available on Github at <https://github.com/NGPVAN/osdi-service>.

Shai Sachs 10:43a [D312]

51. Seth Bannon "Yahoo! Nicely done Shai and team!" 10:44a [D312]

52. Jason Rosenbaum "Congrats! Looks really awesome!" 10:45a [D312]

Shai, congrats and thanks. Can you send the link, for tweeting, and perhaps cross post it to <http://www.ngpvan.com/blog> and the OSDI blog?

And yeah I need to finish the OSDI blog post about the CiviCRM implementation alpha :). On Sep 9, 2015 10:43 AM, "Shai Sachs" wrote:

Joe McLaughlin 11:09a [D312]



"D312Ptweet" [D312]

53. Josh Cohen "Awesome!" 4:24p [D312]

## V ACTION SQUARED'S INFRINGEMENT

54. Between 2014 and Q1 2020, Action Squared and its co-conspirators engaged in racketeering activity to gain control of the project, operate the project, and invest the proceeds into their own enterprises, including Action Squared.
55. Action Squared is a joint development effort between Action Network and AFL-CIO, which contains two products Action Network and Action Builder.
56. In November 2020, Action Network launched its partner integration program. In its announcement, Plaintiff's authorship is repudiated. This is the first public example Plaintiff discovered which treats the OSDI IP as their own proprietary API and ecosystem.
57. <https://web.archive.org/web/20201202175835/https://medium.com/powering-progressive-movements/integrating-your-platform-with-action-network-is-now-easier-than-ever-ca24ba32ce69>

58. The license for the IP is posted here:  
<https://github.com/opensupporter/osdi-docs/blob/gh-pages/license.md>
59. Action Network's use of the OSDI IP can be found at:
- <https://actionnetwork.org/docs>
  - [https://actionnetwork.org/docs/v2/person\\_signup\\_helper](https://actionnetwork.org/docs/v2/person_signup_helper)
61. In Summer 2022, ActionBuilder released their API
- [https://www.actionbuilder.org/docs/v1/person\\_signup\\_helper.html](https://www.actionbuilder.org/docs/v1/person_signup_helper.html)
62. Both exceed the Copyright License. They are used for commercial purposes, allowing these products to leverage the economy of scale created by the OSDI project, the bulk of which are Plaintiff's contributions. Defendants racketeering activity, and attempts to undermine the project are indicative of willfulness.
63. These infringe on Plaintiff's copyright registrations: Txu 2-249-951 and TX0009315996.
64. See Exhibits A and B.

## VI CLAIMS

65. Count 1: Copyright Infringement
66. By Defendant's actions alleged above, products Action Builder and Action Network has infringed and will continue to infringe upon Plaintiff's contributions to the OSDI specification, registrations Txu 2-249-951 and TX0009315996. Defendant's infringement is willful, and have realized unjust profits, gains and advantages as a proximate result of its infringement. Plaintiff, as well as other market participants suffer and will continue to suffer monetary loss, barriers to fair competition as a direct and proximate result of Defendants actions.

## VII PRAYER FOR RELIEF

67. Plaintiff seeks declarative judgement on copyright authorship. Specifically, Action Network and Action Builder may not refer to the work as their proprietary APIs.
68. Plaintiff seeks injunctive relief, preventing Defendants from continuing their infringing use.
69. Plaintiff seeks monetary damages
70. Respectfully Submitted, /s/Josh R. Cohen

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-D174- 12/12/2012 Document: "Rootscamp Kickoff Panel", J. Cohen, [D174 on talker](#)  
-D208- 11/4/2013 Email: "Invitation Extended To Action Network", Tim Anderegg, Noi, Jason Rosenbaum, Action Network, Josh Cohen, Osdi, Unknown, [D208 on talker](#)  
-D230- 3/7/2014 Document: "Instantiation Of Osdi Executive Committee", [D230 on talker](#)  
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